

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MARISSA COLLINS, on her own behalf, and
on behalf of all others similarly situated,
JAMES BURNETT, on behalf of his son, and
on behalf of all others similarly situated, and
KARYN SANCHEZ, on behalf of her minor
son and all others similarly situated,

Plaintiffs,

v.

ANTHEM, INC. and ANTHEM UM
SERVICES, INC.,

Defendants.

A.I., on behalf of his minor daughter and all
others similarly situated,

Intervenor Plaintiff,

v.

ANTHEM, INC. and ANTHEM UM
SERVICES, INC.,

Defendants.

Civil Action No. 2:20-cv-01969-FB-SIL

INDEX OF EXHIBITS TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Exhibits to Memorandum of Law in Support of Plaintiffs' Motion for Class Certification:

Exhibit No.	Description
1.	Joint Stipulation Concerning Member Sample
2.	Member Sample List
3.	Excerpts from the June 22, 2022 Deposition of Dr. Rowland Pearsall, Defendants' 30(b)(6) designee
4.	Excerpts from the June 15, 2022 Deposition of Dr. Keith Isenberg, Defendants' 30(b)(6) designee
5.	Admin.00001 (2017) (ANTM_COL_0002885)
6.	Admin.00001 (2020) (ANTM_COL_0004609)
7.	Anthem Medical Policy No. Admin.0004H (Oct. 4, 2016) (ANTM_COL_0002954-55)

Exhibit No.	Description
8.	Anthem Medical Policy No. Admin.0004 (July 8, 2020) (ANTM_COL_0004614-15)
9.	Anthem UMPD – 2017 (ANTM_COL_0066499-519)
10.	Anthem UMPD – 2018 (ANTM_COL_0002436-60)
11.	Anthem UMPD – 2019 (ANTM_COL_0002510-32)
12.	Anthem UMPD – 2020 (ANTM_COL_0002581-603)
13.	Anthem UMPD – 2021 (ANTM_COL_0002650-73)
14.	Utilization Management Operational Guideline: Benefit Review (approved Nov. 10, 2020) (ANTM_COL_0005936-39)
15.	Anthem UM Services, Inc., Utilization Review/ Management Process Policy entitled, “Utilization Review Process” (Dec. 18, 2020) (ANTM_COL_0001974-94)
16.	2017 Peer Reviewer Training Manual (ANTM_COL_0000001-59)
17.	2018 Peer Reviewer Training Manual (ANTM_COL_0005956-6016)
18.	2019 Peer Reviewer Training Manual (ANTM_COL_0137780-846)
19.	2020 Peer Reviewer Training Manual (ANTM_COL_0001879-1944)
20.	Enterprise Framework for Medical Policy & Clinical UM Guideline Implementation (Dec. 10, 2019) (ANTM_COL_0002987-92)
21.	Anthem Process Guide # PIRRAC.001, entitled, “Operational Guideline for Physicians Inter-rater Reliability Assessment” (approved 2020) (ANTM_COL_0001426-32)
22.	Behavioral Health Physician Inter Rater Reliability Report (2017) (ANTM_COL_0001455-65)
23.	Behavioral Health Physician Inter Rater Reliability Report (2018) (ANTM_COL_0001466-76)
24.	Behavioral Health Physician Inter Rater Reliability Report (2019) (ANTM_COL_0001477-88)
25.	Behavioral Health Physician Inter Rater Reliability Report (2020) (ANTM_COL_0001945-59)
26.	Expert Report of Andrew J. Gerber, MD PhD
27.	Excerpts from the August 18, 2022 Deposition of Dr. Andrew Gerber
28.	Expert Report of Marc Fishman, M.D.
29.	Excerpts from the August 25, 2022 Deposition of Dr. Marc Fishman
30.	Excerpts from the November 3, 2022 Deposition of Dr. David Rosenberg
31.	Level of Care Utilization System for Psychiatric and Addiction Services (“LOCUS”) (December 2016)
32.	MCG White Paper – Mental Health Parity: Where Have We Come From? Where Are We Now? (2017)
33.	Excerpts from the June 13, 2022 Deposition of Plaintiff Marissa Collins
34.	Excerpts from the June 23, 2022 Deposition of Plaintiff James Burnett
35.	Excerpts from the May 23, 2022 Deposition of Plaintiff Karyn Sanchez
36.	Excerpts from the July 28, 2022 Deposition of Plaintiff A.I.
37.	Zuckerman Spaeder LLP Biographies
38.	Psych-Appeal, Inc. Biography

Exhibit No.	Description
39.	Berger Montague Biographies

Exhibits to Declaration of Caroline E. Reynolds in Support of Plaintiffs' Motion for Class Certification:

Exhibit(s)	Description
A-001-A383	Claim Sample Members' Denial Letters
B-001-B-383	Claim Sample Members' Plan Documents Produced by Anthem
C-01-C03	Anthem Clinical UM Guideline, "Psychiatric Disorder Treatment" (CG-BEH-03)
C-04-C-05	Anthem Clinical UM Guidelines, "Substance-Related and Addictive Disorder Treatment" (CG-BEH-04)
C-06-C-09	MCG Guideline for Residential Behavioral Health Level of Care, Adult (B-901-RES (BHG))
C10-C15	MCG Guideline for Residential Behavioral Health Level of Care, Child or Adolescent (B-902-RES (BHG))
C16-C20	MCG Guideline for Substance-Related Disorders, Residential Behavioral Health Level of Care, Adult (B-903-RES (BHG))
C21-C24	MCG Guideline for Substance-Related Disorders, Residential Behavioral Health Level of Care, Child or Adolescent (B-907-RES (BHG))
D	Denial Rationale Summary Chart
E	Plan Document Citations: Residential Behavioral Health Treatment Covered
F	Plan Document Citations: Medical Necessity Requirement
G	Plan Language: Medical Necessity Definition
H	Excerpt from Anthem's records on Sample Member No. 26
I	Excerpt from Appeal File - Sample Member No. 70
J	Excerpt from Appeal File - Sample Member No. 154
K	Excerpt from Appeal File - Sample Member No. 262

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2022, I caused the foregoing to be served via electronic mail on Martin J. Bishop (mbishop@reedsmith.com), Rebecca R. Hanson (rhanson@reedsmith.com), Samuel Kadosh (skadosh@reedsmith.com), and Robert Deegan (rdeegan@reedsmith.com) counsel for Defendants Anthem, Inc. and Anthem UM Services, Inc.

/s/ Caroline E. Reynolds
Caroline E. Reynolds